

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHWESTERN DIVISION

UNITED STATES OF AMERICA, ) No.: 23-3016-01-CR-S-MDH  
                              )  
Plaintiff,                )  
                              )  
Vs.                        )  
                              )  
TIMOTHY ZEGAR,            )  
                              )  
Defendant,                )

**MOTION FOR CONTINUANCE**

Comes now defendant, Timothy Zegar, by counsel, and moves this Court, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B), to continue this case from the scheduled Jury Trial of May 1, 2023.

**SUGGESTIONS IN SUPPORT**

1. Counsel needs additional time to obtain discovery, review and discuss same with client.
2. Further, new information leads to the possibility that this case will be a Plea of Guilty instead of a trial. More time is needed to determine that.
3. This continuance is not sought for purpose of dilatory delay but is sought in truth and fact so that the defendant may be afforded due process of law under the Fifth Amendment to the United States Constitution. In accordance with 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), it is submitted that a continuance

outweighs the best interests of the public and the defendant to a speedy trial, which is required by 18 U.S.C. § 3161(c)(1).

**WHEREFORE**, the defendant respectfully requests this Court, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B), to remove this case from its scheduled setting and to continue this case.

Respectfully Submitted,

/s/S. Dean Price  
S. Dean Price  
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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was electronically filed on this 6th day of April 2023 for distribution to interested parties and attorneys of record.

By: /s/S. Dean Price  
S. Dean Price